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Attorneys for Plaintiff
WALTER DELSON

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

WALTER DELSON,
Plaintiff,

CASE NO. C11-03781 MEJ
Civil Rights

v.

**STIPULATION AND ~~[PROPOSED]~~
ORDER FOR DISMISSAL WITH
PREJUDICE**

CYCT MANAGEMENT GROUP,
INC.; KINGS TRIUMPH, LLC;
LINDA YU- LING TU TRUST;
LALEH HERAVI dba Fondue Fred;
and DOES 1-20, Inclusive,

Pursuant to FRCP Rule 41(a)(2)

Defendants.

Plaintiff WALTER DELSON and defendant LALEH HERAVI dba Fondue Fred hereby jointly stipulate and request through their respective attorneys of record that the Court dismiss this case with prejudice pursuant to FRCP 41(a)(2). This request and stipulation is based on the following good cause:

1. Whereas the only remaining issue in this case is payment of plaintiff's attorney fees in the amount of \$81,851.50 as Ordered by the Court on April 30, 2013 (Docket no. 45);
2. Whereas defendants CYCT Management Group, Inc., King's Triumph, LLC, and Linda Lu-Ling Tu Trust have now paid this amount in full;
3. Whereas the parties have agreed to injunctive relief for barrier removal

1 pursuant to the Consent Decree entered on June 11, 2012, (Docket no 21),
2 and under which this Court will continue to have jurisdiction to enforce its
3 provisions;

4 4. The parties therefore jointly stipulate and request that the Court grant a
5 dismissal of this case with prejudice without entering judgment against
6 defendants.

7 IT IS SO STIPULATED.

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9 Dated: June 18, 2013

LAW OFFICES OF PAUL L. REIN

10
11 /s/Paul L. Rein
12 By PAUL L. REIN
13 Attorneys for Plaintiff
WALTER DELSON

14 Dated: June 5, 2013

SCHEER LAW GROUP

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16 /s/Jonathan Seigel
17 By JONATHAN SEIGEL, Esq.
18 Attorneys for Defendant
19 LALEH HERAVI dba Fondue Fred
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ORDER

Good cause having been shown, this case is dismissed with prejudice pursuant to FRCP 41(a)(2) as to LALEH HERAVI dba Fondue Fred.

IT IS SO ORDERED.

Dated: June 20, 2013



MARIA ELENA JAMES
United States Chief Magistrate Judge